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11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 F.G. PINKSTON,)
15 Plaintiff,) Case No.: 2:20-cv-01747-EJY
16 vs.)
17 ANDREW SAUL,) **UNOPPOSED MOTION FOR EXTENSION OF**
18 Commissioner of Social Security,) **TIME TO RESPOND TO PLAINTIFF'S**
19 Defendant.) **COMPLAINT**
20) **(SECOND REQUEST)**
21)
22)
23)
24)
25)
26)

1 Defendant, Andrew Saul, Commissioner of Social Security (the “Commissioner”), by and through
2 his undersigned attorneys, hereby moves for a thirty-day extension of time to respond to Plaintiff’s
3 Complaint. The Commissioner’s response is currently due on March 18, 2021. This is the
4 Commissioner’s second request for an extension of time (*see* Dkt. Nos. 19, 20).

5 Good cause exists for this extension request because the Office of Appellate Operations (OAO)
6 has not yet completed the documents required to respond to the Complaint. This request is made in good
7 faith and with no intention to unduly delay the proceedings, and counsel apologizes for any
8 inconvenience.

9 On March 17, 2021, the undersigned conferred with Plaintiff via email concerning the requested
10 extension. Plaintiff does not oppose the requested extension.

11 It is therefore respectfully requested that Defendant be granted an extension of time to file his
12 response to Plaintiff’s Complaint, through and including April 19, 2021.

13
14 Dated: March 18, 2021

15 CHRISTOPHER CHIOU
16 Acting United States Attorney

17 /s/ Allison J. Cheung
18 ALLISON J. CHEUNG
19 Special Assistant United States Attorney

20
21 IT IS SO ORDERED:

22 
23 ELAYNA J. YOUCAH
24 UNITED STATES MAGISTRATE JUDGE

25 DATED this 18th day of March, 2021.